

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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JENNIFER BROWN, on behalf of herself
And all others similarly situated,

Case No.: 2:18-cv-896-LDW-SIL

Plaintiff,

v.

MRS BPO, LLC,

Defendant.

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PROPOSED SCHEDULING ORDER

Upon consent of the appearing parties and their counsel, it is hereby **ORDERED** as follows:

- 1) Automatic disclosures required by Rule 26(a)(1) of the Federal Rules of Civil Procedure must be completed by March 12, 2018, if not yet completed.
- 2) Initial document requests and interrogatories will be served no later than April 13, 2018.
If the parties intend to issue interrogatories, they will serve no more than 25 interrogatories. The parties are aware that the presumptive cap on the number of interrogatories is 25, including subparts.
- 3) Electronic Discovery – The parties agree to preserve all electronic records that bear on any claims, defenses or the subject matter of this lawsuit. Production of electronically stored information shall be in Portable Format (.pdf) unless otherwise agreed upon by the parties or by other Court order. If needed, the parties shall jointly file a stipulated protective order for the Court’s review.
- 4) Motions to amend pleadings or add parties shall be made by June 1, 2018.
- 5) Written discovery shall be completed by July 31, 2018.
- 6) Depositions:

Number of depositions by plaintiff(s) of: parties 2 non-parties 2

Number of depositions by defendant(s) of: parties 2 non-parties 2

Time limits for depositions: 4 hours

- 7) Expert depositions shall be completed on or before N/A.
- 8) All discovery, including any depositions, shall be completed on or before September 17, 2018.
- 9) Any dispositive motion practice must be commenced by October 17, 2018.
- 10) A proposed joint pre-trial order must be filed (or if required by the District Judge, a scheduling date must be requested) by _____.

This scheduling order may be altered or amended only upon a showing of good cause based on circumstances not foreseeable as of the date hereof.

Dated: Central Islip, New York

STEVEN I. LOCKE
UNITED STATES MAGISTRATE JUDGE

CONSENTED TO BY COUNSEL:

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